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November 18, 2020

BY ECF

Honorable George B. Daniels
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Anwyn Goldberg, et al. v. City of New York, et al.,
19-CV-04241 (GBD)(KHP)

Your Honor:

I am the Assistant Corporation Counsel in the Office of James E. Johnson, Corporation Counsel of the City of New York, assigned to the defense of this matter. I am writing on behalf of defendants City of New York and Officer Mclasky to respectfully request an extension from November 20, 2020, to December 1, 2020, to file their Summary Judgment Motion. This is the first request for an enlargement of time to file defendants' Summary Judgment Motion. Should the Court grant defendants' aforementioned enlargement request, defendants would also respectfully request that the entire briefing schedule be extended to the following new deadlines: 1) Plaintiffs' Opposition and Cross Motion for Summary Judgment to be extended from December 21, 2020 to January 4, 2020 (in consideration of the holiday season); 2) Defendants' Reply and Opposition to be extended from January 21, 2021 to February 2, 2021; and Plaintiffs' Reply to be extended from February 18, 2021 to February 26, 2021. Plaintiffs consent to the aforementioned extension requests. See Civil Docket No. 45, filed October 7, 2020.

By way of background, on October 7, 2020 the Court ordered the aforementioned briefing scheduled. See Civil Case Docket No. 45, filed October 7, 2020. I have been working diligently to complete defendants' motion for summary judgment. However, due to a heavy case load the past month, as well as various technological restrictions from working remotely which have impacted my ability to efficiently prepare defendants' motion, I would greatly appreciate a brief extension to finalize and file defendants' Summary Judgment Motion in this matter.

Thank you for your consideration in this regard.

Respectfully submitted,

Morgan C. McKinney.

Morgan C. McKinney, Esq.
Assistant Corporation Counsel
Special Federal Litigation Division

cc: VIA ECF
Samuel DePaola, Esq.
Attorney for Plaintiffs

The summary judgment briefing schedule extensions sought above are hereby GRANTED. Defendants' summary judgment motion due December 1, 2020; Plaintiffs' opposition and cross-motion due January 4, 2021; Defendants' Reply and Opposition due February 2, 2021; and Plaintiffs' Reply due February 26, 2021.

APPLICATION GRANTED

Katharine H. Parker

Hon. Katharine H. Parker, U.S.M.J.

Date: November 19, 2020